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VIA ECF

Hon. Judge John G. Koeltl United States Magistrate Judge Southern District of New York 40 Centre Street New York, NY 10007

December 14, 2020

Application granted. SO ORDERED.

New York, New York <u>/s/ John G. Koeltl</u> December 14, 2020 John G. Koeltl, U.S.D.J.

Re: Paguada v. Full Circle Homes, LLC; Case No: 1:20-cv-05717-JGK

To the Honorable Judge Koeltl,

The undersigned represents Plaintiff Josue Paguada (hereinafter "Plaintiff") in the above-referenced matter.

This Letter is submitted in response to the Court's November 16, 2020 Order directing Plaintiff to move for a default judgement by December 7, 2020.

By way of background, this matter has been pending before the Court since July 23, 2020 and while Defendant was properly served (and Affidavit of Service filed on the docket), Defendant failed to appear or otherwise respond.

Plaintiff is in the process of obtaining a Certificate of Default from the Clerk of the Court as to Full Circle Homes, LLC and will promptly be filing its Order to Show Cause for a Default Judgement in accordance with the Court's Individual Rules.

As such, Plaintiff is requesting 21 days in which to attempt to contact Defendant or in the alternative, move for Default Judgment.

Thank you for the consideration of Plaintiff's request.

Yours sincerely,

/s/Mars Khaimov

Mars Khaimov, Esq., **Principal Mars Khaimov Law, PLLC**